

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, NICHOLAS ELEFTERAKIS,
NICHOLAS LIAKIS, and IME COMPANIONS LLC,

Defendants.

-----X

SAFA GELARDI and IME COMPANIONS, LLC,

Third-Party Plaintiffs,

-against-

CARLOS ROA,

Third-Party Defendant.

-----X

CARLOS ROA,

Third-Party Counter-Claimant,

-against-

SAFA ABUDLRAHIM GELARDI, VITO GELARDI,
and IME COMPANIONS, LLC,

Third-Party Counter-Defendants.

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Case No.: 1:22-cv-1032 (PKC) (JRC)

**NOTICE OF CROSS-MOTION
FOR LEAVE TO AMEND THE
COMPLAINT**

PLEASE TAKE NOTICE that upon the Declaration of Emanuel Kataev, Esq., dated February 6, 2023, the exhibit annexed thereto, and the accompanying Memorandum of Law, Plaintiff shall move this Court at the United States District Courthouse, located at 225 Cadman Plaza East, Brooklyn, New York 11201, on a date and time to be set by the Court, for an Order, pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure, granting Plaintiff leave to file a Second Amended Complaint in this case, and for such other and further relief as this Court may deem just, equitable, and proper.

Dated: Lake Success, New York
February 6, 2023

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s/

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United States District Court
Eastern District of New York
Attn: Hon. James R. Cho, U.S.M.J.
225 Cadman Plaza East
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Brooklyn, NY 11201-1804